

EXHIBIT 3

In The Matter Of:
Juice Entertainment, et al v.
Live Nation Entertainment

Thomas Dorfman
November 12, 2013

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| <p>Dorfman - direct Page 29</p> <p>1 Q Prior to 2010, were you ever 2 involved in any outdoor music festivals? 3 A Can you be more specific, what 4 you mean by festivals? 5 Q Are you familiar with the word 6 "festival" being used in the music industry? 7 A Yes. 8 Q What does it mean to you? 9 A What it means to me right now is 10 large scale electronic dance festivals, as the 11 electronic dance music has exploded, and 30,000 12 to a hundred thousand person event. 13 Q Is it possible for there to be a 14 music festival that has less than 30,000 people 15 in attendance? 16 A I guess so, if you call it a 17 festival. But to me, if you ask me what it 18 means, a music festival is a large scale event. 19 Q What makes an event large scale 20 in your understanding, such that it could be 21 called a festival? Is it, for example, the 22 number of acts? The number of attendees? Or 23 something else? 24 A The question you're asking me 25 really can vary, but my answer would be a</p> | <p>Dorfman - direct Page 31</p> <p>1 could go on and on. 2 Q Well, have you given me a list 3 that summarizes your experience prior to 2010 4 with music festivals? 5 A Yeah. Rock. The majority of 6 most music genres, my specialty being electronic 7 dance festivals. 8 Q Were any of those thousands of 9 festivals outdoors? 10 A Yes. 11 Q Which ones? 12 A There were some at the Surf Club 13 that I did multiple events over multiple years, 14 Nicki's Beach, like the girl, and Sand Bar. 15 Q Any other outdoor festivals you 16 were involved in prior to 2010? 17 A Not that I can recall off the top 18 of my head. 19 Q Where are the Surf Club, Nicki's 20 Beach and Sand Bar? 21 A The Surf Club was in Ortley 22 Beach. Sand Bar was in Jersey City. Nicki's 23 Beach, I don't know if it's still there, was in 24 Miami, Florida. 25 Q What kind of outdoor music</p> |
| <p>Dorfman - direct Page 30</p> <p>1 festival is, at least a successful one, has 2 premium talent and has a large occupancy, such 3 as ultra festival and many other entertainment. 4 Q Using your definition of a 5 festival, how many music festivals were you 6 involved in prior to 2010? 7 A If you used the definition I used 8 for music festivals, large scale musical 9 festivals, I would say then I was not involved 10 in any at that time. 11 Q What if we changed the definition 12 of music festival? You said large scale music 13 festival. 14 How about if we take out large 15 scale and just use the word music festival, how 16 many music festivals were you involved in prior 17 to 2010? 18 A Thousands. 19 Q What kinds of music festivals 20 were you involved in prior to 2010? 21 A If you are talking smaller scale 22 ones like we are saying now, electronic dance 23 deejays, which was the major primary background 24 of myself, my career. Latin music events. Pop 25 music events. Teen music events. Many more. I</p> | <p>Dorfman - direct Page 32</p> <p>1 festivals were you involved in at Surf Club? 2 A Electronic dance. 3 Q Anything else? 4 A No, sir. 5 Q What kind of outdoor festivals 6 were you involved in at Nicki's Beach? 7 A Electronic dance. 8 Q What kinds of festivals, outdoor 9 festivals were you involved in at Sand Bar? 10 A Sand Bar would be a mix of 11 electronic dance, some top 40 entertainment, and 12 that would really be the main scope of that. 13 Some actually, I believe, a little bit hip hop, 14 possibly. 15 Q And how were you involved in 16 connection with the outdoor festivals at Surf 17 Club, Nicki's Beach and Sand Bar? 18 A They varied from event to event. 19 But my involvement went from booking talent to 20 marketing the event, by handling the promotion 21 through many different avenues, from radio 22 promotion to street promotions, which is flyer 23 distribution, to e-mails, to text messages, 24 through data bases of mine, through direct mail 25 that I acquired over the years, to staging and</p> |

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| <p>Dorfman - direct Page 33</p> <p>1 setting up the event, making sure the production 2 was proper for the event, and handling some of 3 the events from complete start to finish. 4 Q Tell me about the outdoor nature 5 of the space at the Surf Club in which you were 6 involved in an outdoor music festival. 7 A I guess you're calling the word 8 outdoor music festival, the small events I'm 9 speaking of, correct. 10 Q I thought that's what we were 11 talking about. 12 A Sure. Can you rephrase that? 13 Q Describe the outdoor space at the 14 Surf Club in which you put on the outdoor music 15 festival. 16 A The Surf Club was an 17 indoor/outdoor nightclub that was directly 18 located on the beach in Ortley Beach, 19 New Jersey, and we had the deejays perform 20 outside and then perform inside. 21 When I first was involved in the 22 Surf Club, there was a lot more outside because 23 there was a lot more beach before the water came 24 up. 25 Then years later it was a smaller</p> | <p>Dorfman - direct Page 35</p> <p>1 Q What about Sand Bar? 2 A Three to 5,000 people. 3 Q Were you ever involved, prior to 4 2010, in outdoor music festivals that had more 5 than 5,000 people in attendance? 6 A No, sir. 7 Q Were you ever involved, prior to 8 2010, in putting on an outdoor music festival 9 that lasted for more than one day? 10 A No, sir. I wasn't involved in 11 one that lasted more than one day, but I did 12 produce many of them on a weekly basis. 13 Q Now, am I correct in 14 understanding that you were involved in the 15 aspect of the business prior to 2010 that 16 involved buying talent? 17 A In some aspects of my business, 18 yes. 19 Q Describe that to me. 20 A The aspects of buying talent? 21 Q Yes. 22 A Okay, glad to explain. 23 For a venue I would call up 24 agencies and secure talent for a particular 25 event that I would be producing.</p> |
| <p>Dorfman - direct Page 34</p> <p>1 beach, so a lot more inside. 2 Q And can you answer the same 3 question with respect to Nicki's Beach? 4 A Nicki's Beach I did one event at, 5 and that was a complete hundred percent outside 6 venue. 7 Q What about Sand Bar? 8 A The Sand Bar was an 9 indoor/outdoor venue. 10 Q Can you describe the outdoor 11 aspect of it? 12 A The outdoor aspect of the venue 13 probably held up to three, 4,000 people. 14 Q And where was that located? 15 A In Jersey City, right on the 16 Hudson. 17 Q What was the largest number of 18 attendees at an outdoor music festival you were 19 involved in at Surf Club? 20 A Approximately three or 4,000 21 thousand people. 22 Q Same question with respect to 23 Nicki's Beach? 24 A Approximately 4,000 people, off 25 the top of my head.</p> | <p>Dorfman - direct Page 36</p> <p>1 Q Were there other circumstances 2 when you would be a talent buyer? 3 A I did that on a small level, more 4 to probably help somebody out if I wasn't doing 5 it. Mostly I did it for myself, for my own 6 events. 7 Q Okay. 8 While you were a buyer of talent, 9 do you recall the time frame that that occurred 10 in? 11 A I did it through my whole career. 12 Q Did you ever interact with any of 13 the following talent agencies: William Morris 14 Endeavor, AM only, and/or Wind Dish agency? 15 W-i-n-d-i-s-h. 16 A The only one I act indirectly 17 with would be AM Only. 18 Q With whom did you interact at AM 19 Only? 20 A I believe it was Matthew 21 Rodriguez and Emma Hauser, to the best of my 22 knowledge. 23 Q Do you recall when you interacted 24 with Mr. Rodriguez or Ms. Hauser from AM Only? 25 A Would you like a very broad range</p> |

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| <p>Dorfman - direct Page 53</p> <p>1 Q Any other lawsuit in which you've 2 been a party? 3 A No, sir. 4 Q You haven't commenced a lawsuit 5 relating to having been in a car accident? 6 A Not to my recollection. 7 Q Okay. 8 What about John Chiasullo, do you 9 know who he is? 10 A Yes, I do. 11 Q Has he sued you? 12 A I believe he sent some paperwork 13 over, but I don't believe it went to the 14 position of a lawsuit. 15 Q Did you ever see your name in a 16 lawsuit start by Mr. Chiasullo? 17 A I do recall seeing some 18 paperwork. Nothing more. 19 Q When did you see your name on 20 that paperwork? 21 A Sometime in the last two years, I 22 believe. 23 Q Were you served with a summons 24 and complaint in this case? 25 A I wasn't myself, no.</p> | <p>Dorfman - direct Page 55</p> <p>1 A It was about money that 2 Mr. Chiasullo had loaned me for the Meadowlands 3 State Fair. 4 Q What did the lawsuit seek? 5 A I believe the paper -- I'm not 6 sure if it was a lawsuit -- sought the money 7 that he had loaned us -- loaned me for the 8 Meadowlands Fair. 9 Q Did Mr. Chiasullo get his money 10 back? 11 A No, he hasn't. 12 Q And do you know why nothing 13 happened further with that lawsuit? 14 A I can't speak for Mr. Chiasullo. 15 Q Are there any medical issues that 16 you are suffering from today that you claim are 17 the result of actions taken by Live Nation? 18 A Can you define medical, in what 19 terms, be a little more specific? 20 Q Is it your contention in this 21 lawsuit that you have suffered because of Live 22 Nation? 23 A Yes. 24 Q Describe for me generally 25 speaking how you have suffered?</p> |
| <p>Dorfman - direct Page 54</p> <p>1 Q Do you know whether anyone else 2 was? 3 A Potentially someone at my house. 4 Q Who was that? 5 A Hum? 6 Q Who was that? 7 A Potentially my mother or her 8 terminally ill husband. 9 Q They received a copy of the 10 papers in that case, but you weren't technically 11 served with the complaint. Is that what you're 12 telling me? 13 A I'm saying to the best of my 14 recollection there was some paperwork. 15 Q Okay. 16 How was that lawsuit resolved? 17 Do you know? 18 MR. SIEGAL: I'm going to 19 object -- never mind. Go ahead. 20 A Best of my knowledge there is 21 nothing ongoing with it. 22 Q Do you know what that lawsuit was 23 about? 24 A Yes, I do. 25 Q What was it about?</p> | <p>Dorfman - direct Page 56</p> <p>1 A From Live Nation I was 2 hospitalized with extremely severe pain and I 3 was in the hospital for multiple days, and I had 4 extreme pain through my neck and my head that 5 was unbearable. 6 Then I was also, after losing my 7 entire contract, my entire career, extremely 8 depressed. 9 Q Anything else? 10 A You're talking about physical -- 11 Q Yes. Any other physical harm 12 that you claim Live Nation is responsible for? 13 I assume there is economic harm, am I correct? 14 A You're definitely correct, yes. 15 Q So let's separate out the 16 economic harm because we'll talk about that. 17 I'm just going to concentrate now on the 18 physical harm. 19 You mentioned neck and head pain 20 and depression. 21 Have I correctly remembered that? 22 A Yes, you did, sir. 23 Q It is your contention that Live 24 Nation is responsible for the neck and head pain 25 and the depression?</p> |

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| <p>Dorfman - direct Page 69</p> <p>1 There were some on and off 2 discussions in my nightclub with a lot of these 3 high profile people he was coming in with. 4 Q Did you wind up doing any 5 business with him in connection with those 6 visits? 7 A No. 8 Q When was the first time that you 9 did business with John Sandberg? 10 A The first time I did business 11 with John Sandberg was at the Meadowlands. 12 Q When you say Meadowlands, what do 13 you mean? 14 A The Meadowlands State Fair I had 15 a contract with. 16 Q And the first event that you were 17 going to put on was in June of 2011? 18 A Yes. 19 Q That's the first time that you 20 did business with John Sandberg? 21 A Yes. 22 Q And have you done business with 23 John Sandberg other than with the Meadowlands 24 event that you just described? 25 A No.</p> | <p>Dorfman - direct Page 71</p> <p>1 that took place at the State Fair in 2010? 2 A Yes. 3 Q What was that event? 4 A Latin event. 5 Q Can you tell me, was that the 6 Fiesta Caliente? 7 A I believe that is what it was 8 called. 9 Q Tell me about the event. 10 A Chris Barrett had talked about -- 11 when we had found out about the Meadowlands and 12 the State Fair being a possibility to get into 13 to produce concerts, Chris Barrett spoke with 14 me, and I was very interested immediately to get 15 in and produce an electronic dance festival 16 there. The Meadowlands is prestigious real 17 estate, and we've seen a boom in the electronic 18 dance market as I've been in it my whole life. 19 I got into -- in a short period 20 of time I rushed my foot into the door with Al 21 Dorso, who is the owner of State Fair management 22 to produce events there. And I got my foot in 23 the door and in a short period of time put a 24 Latin concert on to get my foot in the door to 25 set myself up to be able to get an exclusive</p> |
| <p>Dorfman - direct Page 70</p> <p>1 Q When is the last time that you 2 spoke with John Sandberg? 3 A April or May of 2011, best of my 4 recollection. 5 Q Is that the last time that you 6 communicated with him? I asked you specifically 7 the last time you spoke. 8 Does that includes any kind of 9 communication with John Sandberg? 10 A The best I can recall, yes, sir. 11 Q Do you know where John Sandberg 12 is today? 13 A No, I do not. 14 Q I don't mean specifically like 15 today, November 12, 2013. I mean do you know 16 where he lives? 17 A No, I cut all ties with John 18 Sandberg. I haven't spoke to him, so I would 19 have absolutely no idea. 20 Q Frankly, I'm having a hard time 21 finding him. I was going to ask if you could 22 point me in the right direction. 23 A I have no relationship with him. 24 I'm sorry I can't help you on that, sir. 25 Q Were you involved in an event</p> | <p>Dorfman - direct Page 72</p> <p>1 deal for that property and to put on electronic 2 dance festivals. 3 Q How did you first find out about 4 the State Fair being a possible venue for 5 electronic dance festivals? 6 A I believe that Chris was talking 7 to me about it. 8 Q Do you know where he got the 9 idea? 10 A I don't recall. 11 Q And so you put on a Latin 12 festival in 2010 for the purpose of getting your 13 foot in the door because you knew that it would 14 be your future intent to put on electronic dance 15 events? 16 A Yes, and I wanted to get in that 17 door before anybody else could because of the 18 lack of concert real estate out there in the 19 market, and being the Meadowlands with all the 20 up sides to it, I really wanted to get my foot 21 in the door there and build a relationship with 22 Al Dorso. 23 Q Describe the event for me. 24 A Can you be a little bit more 25 specific?</p> |

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| <p>Dorfman - direct Page 73</p> <p>1 Q Who were the performers?</p> <p>2 A I actually do not recall the</p> <p>3 bigger name of the performers. We rushed the</p> <p>4 event and we actually didn't land an anchor. A</p> <p>5 lot of them were names I was not familiar with.</p> <p>6 Two of them I did hear names, but</p> <p>7 I can't remember off the top of my head.</p> <p>8 Q How many performers were there?</p> <p>9 A If you could be more specific, do</p> <p>10 you mean the band members or the actual band?</p> <p>11 Q I don't need to know how many</p> <p>12 people were actually physically present on the</p> <p>13 stage. What I'm driving at is how many acts</p> <p>14 were there?</p> <p>15 A Let me take a guess at it. I</p> <p>16 would say maybe 10 to 15 off the top of my head.</p> <p>17 Q And where physically did the</p> <p>18 event take place?</p> <p>19 A It was at the Meadowlands</p> <p>20 Fairgrounds, actually the temporary fairgrounds,</p> <p>21 because the new Meadowlands stadium was being</p> <p>22 set up.</p> <p>23 They let us know that these were</p> <p>24 the temporary area. The following year would be</p> <p>25 right in front of the new Giants and Jets</p> | <p>Dorfman - direct Page 75</p> <p>1 Wagner was more responsible for</p> <p>2 getting talent together, some of the marketing</p> <p>3 as a Latin promoter, a person that I worked</p> <p>4 closely with.</p> <p>5 I was responsible for some of the</p> <p>6 marketing. Also sponsorship, cutting a deal</p> <p>7 with a radio station and sponsors.</p> <p>8 Me and Chris really worked hand</p> <p>9 in hand with Al, which was really, really</p> <p>10 helpful and receptive, learning the stage, being</p> <p>11 able to get sponsors set up there, and being</p> <p>12 able to run the event.</p> <p>13 Q Did Mr. Barrett do anything that</p> <p>14 you didn't do, or did your activities completely</p> <p>15 overlap?</p> <p>16 A I'm sure there is some stuff that</p> <p>17 he did that I didn't do, but, no, I can't recall</p> <p>18 exactly what it was.</p> <p>19 Q What kind of financing did you</p> <p>20 need to be able to put on the festival?</p> <p>21 A We needed a minimal amount of</p> <p>22 money.</p> <p>23 MR. MARX: Can you mark this,</p> <p>24 please.</p> <p>25</p> |
| <p>Dorfman - direct Page 74</p> <p>1 stadium where they would be having the Super</p> <p>2 Bowl, and it was the temporary fairgrounds until</p> <p>3 the following year.</p> <p>4 Q There was an event within the</p> <p>5 event? There was a designated part of the</p> <p>6 fairgrounds that you were given the right to use</p> <p>7 to put on this Latin festival?</p> <p>8 A Yeah, it's a State Fair that</p> <p>9 usually produces four or five hundred thousand</p> <p>10 people a year New Jersey was very well known</p> <p>11 for, and there was a designated area for it, and</p> <p>12 we would be able to use the whole entire fair,</p> <p>13 the rides, the shows, everything else included</p> <p>14 in their admission.</p> <p>15 Q Who was involved in your side on</p> <p>16 putting on the Latin festival, just you and</p> <p>17 Mr. Barrett, or was there anyone else?</p> <p>18 A Me and Mr. Barrett, and Wagner.</p> <p>19 Q Who is Wagner?</p> <p>20 A He's a Latin promoter.</p> <p>21 Q Can you describe for me what you</p> <p>22 did, what Mr. Barrett did and what Wagner did in</p> <p>23 connection with putting on the festival?</p> <p>24 A We did it in a really short</p> <p>25 period of time. We really rushed it.</p> | <p>Dorfman - direct Page 76</p> <p>1 (Exhibit marked for</p> <p>2 identification TD-2, E-Mail dated June 11, 2010</p> <p>3 with attachment.)</p> <p>4 (Exhibit handed to the witness.)</p> <p>5 Q I'm going to hand you and ask you</p> <p>6 to look at what we marked as exhibit TD-2, a</p> <p>7 two-page document, looks like an e-mail sent</p> <p>8 June 11, 2010 from Chris to Tommy D.</p> <p>9 Who is Chris Asta?</p> <p>10 A Chris Asta is Chris Barrett.</p> <p>11 That's more of his stage name.</p> <p>12 Q Do you know why he's called Chris</p> <p>13 Asta?</p> <p>14 A He's been using that name</p> <p>15 forever. That's all I can tell.</p> <p>16 Q Does Asta mean always stay</p> <p>17 anonymous?</p> <p>18 A I would have absolutely no idea.</p> <p>19 I never heard that.</p> <p>20 Q You never heard that before?</p> <p>21 A No.</p> <p>22 Q This subject is P&L, and the</p> <p>23 second page of the document says, "Meadowlands</p> <p>24 Fair festival P&L."</p> <p>25 Do you know what this document</p> |

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| <p>Dorfman - direct Page 77</p> <p>1 is?</p> <p>2 A It looks like a P&L sheet that</p> <p>3 was sent from Chris to myself, it looks like.</p> <p>4 Q Do you recall him preparing and</p> <p>5 sending to you this sheet?</p> <p>6 A This one in particular I do not</p> <p>7 recall. There are many that were getting</p> <p>8 prepared at the time --</p> <p>9 Q Okay.</p> <p>10 A -- as we were rushing to put on</p> <p>11 the event.</p> <p>12 Q As between you and Chris Barrett,</p> <p>13 is he the guy who prepares things like the P&L</p> <p>14 sheet that we are looking at on TD-2?</p> <p>15 A I do prepare them with Chris, but</p> <p>16 Chris is definitely a much better bookkeeper</p> <p>17 than me and much better at working on the</p> <p>18 computers. A lot of stuff would be prepared</p> <p>19 together.</p> <p>20 Q Be prepared together, but he's</p> <p>21 the one who physically creates them?</p> <p>22 A Inputs the document, yeah, he's a</p> <p>23 lot better at it than me.</p> <p>24 Q Do you know where the records are</p> <p>25 for the Latin festival in 2010?</p> | <p>Dorfman - direct Page 79</p> <p>1 A Some of this stuff in here just</p> <p>2 doesn't seem to be what the actual costs were.</p> <p>3 It seems like this was a mock projection on the</p> <p>4 headliners here, which the best of my memory, I</p> <p>5 don't think these were headliners.</p> <p>6 Q You don't remember who the</p> <p>7 headliners were, but you know they are not</p> <p>8 these?</p> <p>9 A I can't remember the names off</p> <p>10 the top of my head right now. I do know who</p> <p>11 they were, but they weren't an anchor. The big</p> <p>12 thing with the event was being able to have an</p> <p>13 anchor for this event.</p> <p>14 Q Is there a general understanding</p> <p>15 when you are putting on an outdoor festival as</p> <p>16 to what the anchor needs to bring to the event</p> <p>17 in order for it to be successful?</p> <p>18 A Yeah. Well, the anchor has to</p> <p>19 bring, number one, their massive reputation</p> <p>20 where they can draw a very large crowd. If you</p> <p>21 want to have a very successful event and you</p> <p>22 want other people to sign on, you want more</p> <p>23 sponsors to come on board. That's the general</p> <p>24 understanding. You need an anchor.</p> <p>25 Q If you want to have 25,000 people</p> |
| <p>Dorfman - direct Page 78</p> <p>1 A Can you be specific?</p> <p>2 Q Do you have any records relating</p> <p>3 to the Latin festival?</p> <p>4 A Whatever records I have we had to</p> <p>5 turn over to you.</p> <p>6 Q Do you know where those records</p> <p>7 were kept?</p> <p>8 A I believe on the computer e-mail.</p> <p>9 Q Do you know whose computer?</p> <p>10 A Probably Chris', maybe my e-mail.</p> <p>11 It came to my e-mail address, probably me.</p> <p>12 Q Was the event on July 4th, 2010?</p> <p>13 A Yes, sir.</p> <p>14 Q Does looking at TD-2 help remind</p> <p>15 you of certain facts about the expenses</p> <p>16 associated with putting on the event?</p> <p>17 A It shows some of the projected</p> <p>18 things we were putting together on projected</p> <p>19 artists and projected events.</p> <p>20 Q Is that consistent with your</p> <p>21 memory of what the actual expenses were for the</p> <p>22 event?</p> <p>23 A No.</p> <p>24 Q How is it different than what</p> <p>25 your memory is?</p> | <p>Dorfman - direct Page 80</p> <p>1 come to a music festival, is there in the</p> <p>2 industry an understanding of how many people the</p> <p>3 anchor should be counted on to bring in order</p> <p>4 for the event to be successful?</p> <p>5 A It really depends on the event</p> <p>6 and it really depends on who would follow that</p> <p>7 anchor. You would need somebody to bring a</p> <p>8 large number, but I don't know if there is any</p> <p>9 standard on the exact number for that person.</p> <p>10 Q Do you have a recollection of</p> <p>11 what the talent expense was for the 2010 Latin</p> <p>12 festival that you put on?</p> <p>13 A I do not recall off the top of my</p> <p>14 head.</p> <p>15 Q Do you recall how you came up</p> <p>16 with the funding necessary in order to retain</p> <p>17 the talent to that festival?</p> <p>18 A Yes. Chris Barrett's company,</p> <p>19 and also my personal money.</p> <p>20 Q What is Chris Barrett's company</p> <p>21 called?</p> <p>22 A Base Productions, I believe.</p> <p>23 Q Do you recall how much Base</p> <p>24 Productions put up and how much you put up to</p> <p>25 fund the acquisition costs for talent for the</p> |

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| <p>Dorfman - direct Page 81</p> <p>1 Latin festival in 2010?</p> <p>2 A I don't recall in detail.</p> <p>3 Q Was it \$50,000?</p> <p>4 A Could be in that range. I'm not</p> <p>5 sure.</p> <p>6 Q Do you recall the ticket price</p> <p>7 that you charged for that festival?</p> <p>8 A I actually do not recall the</p> <p>9 ticket price.</p> <p>10 Q If I wanted to find out the</p> <p>11 ticket price, where would I look for that?</p> <p>12 A Probably available, probably</p> <p>13 online.</p> <p>14 Q How many people attended that</p> <p>15 festival?</p> <p>16 A I don't exactly recall, but the</p> <p>17 best of my recollection, 1500 to 2,000.</p> <p>18 Q Do you recall how many you were</p> <p>19 anticipating would attend?</p> <p>20 A My anticipation?</p> <p>21 Q Yes.</p> <p>22 A My anticipation, I thought it</p> <p>23 would approximately be around that number, maybe</p> <p>24 a little bit higher.</p> <p>25 Q Were there others you were aware</p> | <p>Dorfman - direct Page 83</p> <p>1 order to make a profit on the Latin festival?</p> <p>2 A To be quite frank with you, I'm</p> <p>3 sure we did, but it didn't make a difference to</p> <p>4 me if I made money or lost money on it. My</p> <p>5 whole goal was to get my foot in the door.</p> <p>6 Q Do you recall whether you made</p> <p>7 money or lost money on the Latin festival?</p> <p>8 A We lost money.</p> <p>9 Q And if I wanted to know the</p> <p>10 details concerning how much it cost you to put a</p> <p>11 festival on, what the ticket price was, what the</p> <p>12 other expenses associated with the festival were</p> <p>13 and what the ultimate P&L was, is there a place</p> <p>14 that I can look to find that? I don't think I</p> <p>15 found it in the materials that we have been</p> <p>16 provided with.</p> <p>17 A Sitting here today, besides the</p> <p>18 materials that we presented to you, which I'm</p> <p>19 not sure if I -- I can't see it here</p> <p>20 obviously -- the thousands of documents we gave</p> <p>21 you, I'm not sure if it's there or not.</p> <p>22 Q Is there a document or any kind</p> <p>23 of record that you recall having that would show</p> <p>24 me that bottom line P&L information that I</p> <p>25 described I was looking for?</p> |
| <p>Dorfman - direct Page 82</p> <p>1 of who had different expectations as to what the</p> <p>2 attendance would be?</p> <p>3 A Yeah, I would say so, because we</p> <p>4 were looking at getting anchors in the event in</p> <p>5 a short period of time. At some point the</p> <p>6 numbers looked higher and sometimes the numbers</p> <p>7 looked a little bit lower.</p> <p>8 I was very satisfied with it in</p> <p>9 the short period of time that we put it on.</p> <p>10 Q For example, Al Dorso, do you</p> <p>11 know what his expectation was for the attendance</p> <p>12 at this festival would be?</p> <p>13 A I think originally we were</p> <p>14 putting it together, I think he originally</p> <p>15 mentioned 10,000 people, I believe, off the top</p> <p>16 of my head.</p> <p>17 Q And you mentioned that to Al?</p> <p>18 A The best I can recall.</p> <p>19 Q And did you discuss that</p> <p>20 anticipated attendance figure with others other</p> <p>21 than Al?</p> <p>22 A At some point in time,</p> <p>23 definitely.</p> <p>24 Q Did you have a number of</p> <p>25 attendees at which you would need to obtain in</p> | <p>Dorfman - direct Page 84</p> <p>1 A I don't recall.</p> <p>2 Q Would you have had some kind of</p> <p>3 final settling up with Al Dorso's company at the</p> <p>4 conclusion of this event where this information</p> <p>5 would be summarized?</p> <p>6 A We did have a setup with Outdoor</p> <p>7 Associates, Al Dorso. I'm not sure if there was</p> <p>8 any paperwork given to us or not. I really</p> <p>9 don't recall that.</p> <p>10 Q How did Al Dorso's company</p> <p>11 receive payment in connection with that</p> <p>12 festival?</p> <p>13 A Al Dorso's company received what</p> <p>14 the State Fair admission would be. It was \$9</p> <p>15 for that day, the best that I can recall, per</p> <p>16 attendee.</p> <p>17 Q Was there any other -- and how</p> <p>18 did you get paid?</p> <p>19 A We got paid off the ticket.</p> <p>20 Q Whatever the ticket price was,</p> <p>21 you would subtract out what you had to pay Al</p> <p>22 Dorso in terms of the \$9 fee, and the rest of</p> <p>23 that was your proceeds?</p> <p>24 A Yeah, that's including</p> <p>25 sponsorship money and anything else that was</p> |

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1 he offered sponsorship, team support and
2 anything really needed to help us with it.
3 I did express to Al that I was
4 afraid that, you know, at this point, that we
5 were going to lose -- as soon as anybody found
6 out there was a bigger company like Pasha,
7 another one like that, that we were going to end
8 up losing our idea with him.
9 At this time Al drove us over to
10 the stadium. He showed us exactly where we
11 would be putting on our concert, right in front
12 of the main entrance to the new stadium. He
13 showed us the entire space, drove us through it.
14 He showed us where we would have
15 a route to bring in all our equipment, where the
16 service road would be. He showed the fence line
17 that he would put up. He showed the water lines
18 that he would put through for the bathrooms. He
19 was very accommodating with us.
20 We were going to need private
21 restrooms backstage for some of the bigger
22 artists, which he said he would fulfill which
23 was not a problem.
24 At this time Al mentioned that
25 WPLJ was interested in producing an event at the

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1 Meadowlands.
2 I told Al, you know, listen, Al,
3 we are putting everything into this. We came in
4 here first. We are putting our life into this.
5 We are working day in and day out for your space
6 for the future.
7 I told him, look, for us to
8 continue going forward after this point right
9 here, we are going to put all the work in. We
10 are going to produce the massive electronic
11 dance festival. Many other people are going to
12 produce other festivals. I said, we need an
13 exclusive to produce all the shows or to broker
14 all the shows at your fairgrounds.
15 So we were looking for a
16 five-year deal with a five-year option.
17 Al said, you know what, boys, you
18 got the deal. And he said -- I told him, Al,
19 someone is going to come in and take this from
20 us. Someone is going to steal it.
21 He said, my word is better than
22 my signature. My word is better than gold.
23 That was the month of October as
24 I can best summarize it for you.
25 Q Do you know what Al and/or Paul

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1 were doing, if anything? You described what you
2 were doing.
3 A Yeah, Alan was working back and
4 forth -- sorry, Paul was working back and forth
5 on potential people to bring on board, possibly
6 Cream Fields, and he reached out to Cream
7 Fields, I believe at this time to the CEO, James
8 Barton, I believe he had a very good
9 relationship with.
10 They were checking with -- we
11 were going over rosters, potential talent that
12 we could put in there. He looked at other
13 festivals, I believe he spoke with Amnesia from
14 Europe at the time.
15 Alan Sachs was involved in
16 conversations. We were coming up with concepts,
17 marketing plans, budgets, potential sponsors,
18 and Paul Potter, having a lot of experience in
19 the sponsorship end, coming on board in what he
20 thought we would receive in sponsorship, the
21 support we were getting from the venue, being on
22 billboards across the whole tri-state area, the
23 Jumbotron at the Meadowlands, the huge signs.
24 They were working heavily on
25 that, and we were working day-to-day on

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1 producing our event.
2 Q Was anybody else involved on your
3 side other than you and Chris Barrett, Alan
4 Sachs and Paul Potter?
5 A At this time, no. I wanted to
6 keep this as a need to know basis, very small
7 and quiet as possible so that the event would
8 not be taken by another company.
9 Q The same question with respect to
10 November of 2010. Who on your side was working
11 in connection with putting on the event for
12 2011, and what were they doing?
13 A On our team in November 2011, it
14 would be the same exact team I just told you.
15 Q Strike that. We want to do 2010.
16 I know you misspoke.
17 A My apologies.
18 2010, November, the same team,
19 between Alan Sachs, Paul Potter, Chris Barrett,
20 and we continued working on projected lineups.
21 I believe at this time Paul
22 Potter may have reached out to someone in
23 Europe, the William Morris agency, by the name
24 of David Levy, the best of my recollection,
25 about potentially getting the head of Europe,

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| <p>Dorfman - direct Page 117</p> <p>1 (Pause.)</p> <p>2 Q Have you had the time to look at</p> <p>3 TD-3?</p> <p>4 A Yes, I have.</p> <p>5 Q Were you aware of the fact that</p> <p>6 Electric Daisy Carnival was putting on</p> <p>7 electronic dance music festival in Las Vegas on</p> <p>8 June 24th, 25th and 26th, 2011?</p> <p>9 A Absolutely.</p> <p>10 Q When did you become aware of</p> <p>11 that?</p> <p>12 A I believe that we spoke with</p> <p>13 Electric Daisy Carnival. I believe their dates</p> <p>14 actually had changed. This is Las Vegas, sir?</p> <p>15 Q I believe so. That's what it</p> <p>16 says.</p> <p>17 A I believe originally their dates</p> <p>18 had to change because they lost the venue that</p> <p>19 they were originally doing it at in Los Angeles,</p> <p>20 but I believe at some point in time I definitely</p> <p>21 saw they were doing events the same weekend as</p> <p>22 us, which I thought was a great thing.</p> <p>23 Q On the talent list here, do you</p> <p>24 recognize any of the artists that were appearing</p> <p>25 at the Electric Daisy Carnival in Las Vegas on</p> | <p>Dorfman - direct Page 119</p> <p>1 So I guess my question relates to</p> <p>2 artists who were appearing in Las Vegas on</p> <p>3 Friday, Saturday and Sunday.</p> <p>4 Were there any artists on those</p> <p>5 lists for the Electric Daisy Carnival event in</p> <p>6 Las Vegas on Friday, Saturday and Sunday that</p> <p>7 you wanted to appear in New Jersey on Saturday</p> <p>8 and/or Sunday?</p> <p>9 A Yes, sir.</p> <p>10 Q Why don't I read off the list as</p> <p>11 I understand it, based on my having looked at</p> <p>12 the artists, and you can tell me whether they</p> <p>13 were artists that you wanted to appear in</p> <p>14 New Jersey, okay?</p> <p>15 A Sir, we did put a lot of offers</p> <p>16 out. Off the top of my head I'm not going to</p> <p>17 give you an accurate answer on every detail that</p> <p>18 we put an offer in to or not.</p> <p>19 Q Who was responsible for making</p> <p>20 offers to the artists?</p> <p>21 A John DiMatteo.</p> <p>22 Q Did you make any offers?</p> <p>23 A By me sending it to the agent?</p> <p>24 Q Yes.</p> <p>25 A No, John DiMatteo.</p> |
| <p>Dorfman - direct Page 118</p> <p>1 June 24th, 25th and 26th as being artists that</p> <p>2 you made offers to and wished to appear at your</p> <p>3 event at the State Fair on the 25th and 26th of</p> <p>4 June?</p> <p>5 A The question being on their</p> <p>6 lineup from the 25th and 26th?</p> <p>7 Q Yes.</p> <p>8 Was there overlap between the</p> <p>9 artists that had committed to and appeared in</p> <p>10 Las Vegas and that you wanted to appear in</p> <p>11 New Jersey during the same time frame?</p> <p>12 A On Saturday -- just to make sure</p> <p>13 my answer is correct here for your question on</p> <p>14 Electric Daisy Carnival, Las Vegas, Saturday,</p> <p>15 June 25th and Sunday, June 26th, correct?</p> <p>16 Q Let me back up. I'm sorry. I</p> <p>17 appreciate the fact that you are trying to be</p> <p>18 very specific here.</p> <p>19 When was your event supposed to</p> <p>20 take place in New Jersey?</p> <p>21 A Saturday, June 25th and Sunday,</p> <p>22 June 26th.</p> <p>23 Q In New Jersey?</p> <p>24 A In New Jersey.</p> <p>25 Q Right.</p> | <p>Dorfman - direct Page 120</p> <p>1 Q Was John DiMatteo the one from</p> <p>2 your team who made all of the offers?</p> <p>3 A For the electronic dance</p> <p>4 festival?</p> <p>5 Q Yes.</p> <p>6 A Yes.</p> <p>7 Q Were there others on your team</p> <p>8 who made offers for artists other than</p> <p>9 electronic dance?</p> <p>10 A Yes.</p> <p>11 Q What other genres were you making</p> <p>12 offers for?</p> <p>13 A Latin.</p> <p>14 Q Anything else?</p> <p>15 A And we were inquiring about rock</p> <p>16 and pop and top 40.</p> <p>17 Q Who was responsible for making</p> <p>18 offers to talent in those genres?</p> <p>19 A At the time it was myself and</p> <p>20 Chris Barrett.</p> <p>21 Q Anybody else?</p> <p>22 A To actually making the offer?</p> <p>23 Q Yes.</p> <p>24 A No.</p> <p>25 Q Going back to electronic dance</p> |

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| <p>Dorfman - direct Page 121</p> <p>1 festival, am I correct in understanding that 2 John DiMatteo made all of the offers from your 3 team and received all of the responses from the 4 agents to whom the offers had been made? 5 A Yes, sir. 6 Q So any information you had 7 concerning either the offers or the responses to 8 the offers comes to you secondhand, at least 9 secondhand, from Mr. DiMatteo? 10 A Sometimes I was sitting in his 11 office and seeing the offers go out and/or 12 seeing some of the responses coming in. I 13 believe some of it is secondhand. 14 Q You only know either what 15 Mr. DiMatteo had told you or what you personally 16 observed because you were with Mr. DiMatteo 17 either when he made the offer or received the 18 response to the offer? 19 A The information that Mr. DiMatteo 20 sent over to me in correspondence with the 21 agents. 22 Q I'm going to say the name of an 23 artist, and you can tell me whether you 24 think your team made an offer for that artist to 25 appear at the event at the Meadowlands in 2011.</p> | <p>Dorfman - direct Page 123</p> <p>1 A I do not recall. 2 Q David Guetta? 3 A Yes. 4 Q Did I pronounce that correctly? 5 A David Guetta. 6 Q Chuckie? 7 A I do not recall. 8 Q Boris? 9 A I do not recall. 10 Q Victor Calderone? 11 A To the best of my recollection. 12 Q Feed Me? 13 A I do not recall. 14 Q LA Riots? 15 A Yes. 16 Q MSTRKRFT? 17 A I do not recall. 18 Q Is that master craft? 19 Paul Oakenfold? 20 A To the best of my recollection. 21 Q Avici? 22 A I do not recall. 23 Q Laidback Luke? 24 A Yes. 25 Q Robbie Rivera?</p> |
| <p>Dorfman - direct Page 122</p> <p>1 Okay? 2 A Sure. 3 Q Wolfgang Gartner? 4 A Possibly. 5 Q Dirty South? 6 A The best of my recollection, yes. 7 Q Tiesto? 8 A Yes. 9 Q Steve Angello? 10 A Hundred percent. 11 Q Sander VanDoorn? 12 A Yes. 13 Q Richie Hawton? 14 A I do not recall. 15 Q Roger Sanchez? 16 A To the best of my recollection. 17 Q Calvin Harris? 18 A To the best of my recollection. 19 Q Cedric Gervais? 20 A I do not recall. 21 Q Martin Solveig? 22 A I do not recall. 23 Q Afrojack? 24 A Yes. 25 Q Benny Bernasi?</p> | <p>Dorfman - direct Page 124</p> <p>1 A To the best of my recollection. 2 Q Ferry Corsten? 3 A To the best of my recollection. 4 Q Dada Life? 5 A Do not recall. 6 Q Now, did you also understand that 7 Electric Zoo was intending to put on a 8 electronic dance festival in New York on Friday, 9 September 2nd, Saturday, September 3rd and 10 Sunday, September 4th? 11 A Yes. 12 Q When did you become aware of 13 that? 14 A I was aware of that from day one. 15 Q Did you have an understanding as 16 to the impact, if any, the fact that Electric 17 Zoo was putting on a electronic dance festival 18 Labor Day weekend would impact your ability to 19 obtain talent to perform at an electronic dance 20 festival at the Meadowlands on June 25th and 21 26th? 22 A Yes. 23 Q Can you explain -- what was your 24 understanding? 25 A My understanding was that you put</p> |

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1 on a festival, some artists might not be
2 available for our date and some artists may
3 choose to come to our venue.
4 Q Was it your understanding that an
5 artist could play both your event and the
6 Electric Zoo event?
7 A It depends on the artist's
8 contract.
9 Q Can you explain that answer?
10 A It would depend on the contract,
11 how many days out in their contract they weren't
12 allowed to play in another venue.
13 Q Did you have an understanding as
14 to whether a provision that would prevent an
15 artist from playing your event and the Electric
16 Zoo would more likely be found for the kind of
17 headlining tier one artist or more of a less
18 popular artist?
19 A More of the headline.
20 Q So like Tiesto, for example, do
21 you know whether Tiesto would be able to play
22 both at your events and the Electric Zoo events?
23 A I don't know what Tiesto's
24 contract was. I couldn't tell you.
25 Q Would you consider him to be a

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1 A Well, there would be a provision
2 in the contract on a certain amount of days out,
3 certain amount of mileage. I'm not sure if that
4 would have been in our equation with the
5 contract, but I'm not privileged to it.
6 Q For sure. Understood.
7 MR. MARX: Can you mark this,
8 please?
9 (Exhibit marked for
10 identification TD-4, Screen shot printout.)
11 Q I'm going to hand you what we
12 marked as exhibit TD-4 and I'm going to ask you
13 to take a look at it.
14 (Exhibit handed to the witness.)
15 Q It is several pages that I
16 printed from the Internet web site for Made
17 Event dotcom, and specifically an archive
18 relating to the Electric Zoo event from
19 September 2nd through the 4th of 2011.
20 My first question is, have you
21 had enough time to look at it?
22 (Pause.)
23 A Yes, sir.
24 Q Do you know whether -- strike
25 that.

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1 tier one headlining type artist?
2 A Yes, a hundred percent.
3 Q You would assume that he -- based
4 on your answers to the prior question, that his
5 contract would most likely prohibit him from
6 appearing at both your event and the Electric
7 Zoo?
8 MR. SIEGAL: I'm going to object
9 to mischaracterizing the testimony. But you can
10 answer.
11 Q Did I mischaracterize your
12 testimony?
13 A Well, a lot of it is assumption.
14 I'm not privileged to that information on that,
15 so I couldn't give you a hundred percent answer
16 on that.
17 Q Okay.
18 A I don't know what their contracts
19 were.
20 Q Right. But maybe I'm mistaken,
21 but I thought you said that a tier one
22 headlining artist was more likely to have a
23 provision in his contract that would contain the
24 kind of limitation that would prevent him from
25 playing both your event and the Electric Zoo?

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1 I'm going to have the same
2 questions that I had before with respect to
3 artists who appeared at the Electric Zoo that
4 Mr. DiMatteo, on your behalf, extended offers to
5 appear at the Meadowlands event. I'm going to
6 try not to -- my intention will be not to repeat
7 anybody that we already covered with respect to
8 the Electric Daisy Carnival event because I
9 already have your answer as to those. So I
10 don't think there is too many I'm going to ask
11 you about.
12 Do you recall making an offer to
13 Tiga? T-i-g-a.
14 A I do not recall.
15 Q Did you make an offer to the
16 Martinez Brothers?
17 A To the best of my recollection.
18 Q Did you make an offer to Joachim
19 Garraud?
20 A I do not recall.
21 Q Or Invasion?
22 A I do not recall.
23 Q Did you make an offer to
24 Beardyman?
25 A Do not recall.

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1 Electric Daisy first, it came back from them as
2 a positive also, because people -- some of these
3 guys were playing across the whole entire world
4 and now they are all in the United States.
5 Q When you say in town, you mean
6 the very big town?
7 A Yes.
8 Q In town means Las Vegas and
9 East Rutherford being in the same town?
10 A Yeah, I guess for these artists
11 playing worldwide, the U.S. is in town from what
12 I represented.
13 Q Do you recall what artists you
14 were referring to?
15 A I do not recall.
16 Q Okay.
17 What about the impact of Electric
18 Zoo on your ability to get talent for your event
19 on the 25th and 26th, did you consider the
20 impact of that?
21 A Yes.
22 Q What were your considerations?
23 A Well, it was always a
24 consideration of us getting some of the talent
25 in some of the negotiations that we were in. We

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1 knew that Electric Zoo was also looking to
2 obtain some of the talent. It would be a matter
3 of if we got the talent.
4 Q Now, before we went in that
5 direction, the last several questions and
6 answers, I believe we were up to you had
7 summarized up through December 2010 who was
8 involved on your team and what they were doing.
9 I would like you to provide the
10 same summary for January 2011.
11 A Sure.
12 In January 2011, Donny or
13 Pasquale was supposed to be coming to a meeting
14 with us. There was, I believe -- that actually
15 I believe is when the snowstorm was and we were
16 unable to attend.
17 Q Donny and Pasquale are from
18 Insomniac?
19 A Insomniac Productions.
20 Q Insomniac puts on the Electric
21 Daisy Carnival?
22 A Yes.
23 Q Continue, I'm sorry.
24 A We would look at who would be
25 available, continue working on the event in all

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1 aspects and forms.
2 In January I believe we had a
3 meeting with Al Dorso also. Now that we had the
4 engagement letter, we were pursuing people to
5 potentially be involved with us, to partner with
6 us, if we chose to.
7 Insomniac was supposed to come
8 out and meet with us. We set the meeting up
9 through Alan Sachs, and we waited patiently, a
10 nice period of time for them to come out.
11 When they did come out, when they
12 got into New York, I'm not sure if it was Donny
13 or Pasquale off the top of my head, Alan Sachs
14 got a text message from one of the two --
15 actually got the message -- I retract that, I
16 apologize -- he got a text message from Rob
17 Fernandez from Pasha saying, hey, look, I'm with
18 Donny and Pasquale, which one of them it is, and
19 we want to meet and discuss the Meadowlands.
20 In the meantime, in January we
21 talked about, amongst our team, the headliner
22 that we really wanted to get, started to focus
23 on, and it came down to the big headliner we
24 really wanted was Tiesto.
25 To get Tiesto in our area, the

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1 tri-state area it was common knowledge through
2 John DiMatteo.
3 Alan Sachs had a conversation --
4 I don't know if Alan called them or he called
5 him -- Alan spoke with Vito Bruno and John
6 DiMatteo.
7 They were planning a concert the
8 same weekend in, I believe it was Raceway Park
9 in Englishtown, New Jersey. They expressed a
10 very high interest in meeting with us about
11 this -- about our venue.
12 From Alan's words, they really
13 liked the real estate in the Meadowlands.
14 So when Pasquale or Donny landed
15 and the text message came with Pasha -- came
16 from Pasha, kind of took it as more of a little
17 jab. I didn't necessarily want to work with
18 Pasha. I had done business with Pasha before,
19 and I particularly didn't like the way they
20 operated.
21 So we set up a meeting
22 immediately with Vito Bruno and John DiMatteo, I
23 believe around January 20th, January 21st, top
24 of my head. We met with Vito and John.
25 First of all, they applauded me

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1 had consistently done business with them, I
2 believe was a great stepping stone for us in the
3 process to our event.
4 There were only three major
5 talent agencies in our electronic dance
6 festival. Electronic dance festival wasn't
7 mainstream. It was underground. We saw a boom
8 coming. He had -- there were three agencies,
9 William Morris, Name Only and Wind Dish. John
10 had booked consecutively artists from William
11 Morris, Name Only and Wind Dish in the tri-state
12 area successfully.
13 I believe it was very important
14 and it was great that between Vito and John,
15 being local to the area, that we could do
16 business with, and they could be firsthand with
17 us, and adding them in addition to our team,
18 putting my experience on the table, and now
19 these guys, Vito having 35 years of experience
20 in producing massive, big dance festivals at the
21 time for a consistent period of time in the
22 tri-state area, and John DiMatteo had the best
23 relationships. It was a dream team.
24 Q And how do you know that John
25 DiMatteo's relationship with William Morris was

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1 strong? How did you know that?
2 A Well, number one, he's booking
3 the artists successfully, consistently. If you
4 don't have a good relationship with an agency,
5 they are usually not going to be booking the
6 artists consecutively if they are not having a
7 good relationship.
8 At the time John was booking the
9 major electronic dance festival artists in the
10 tri-state area more than anybody else
11 consecutively, consistently.
12 Q Did anybody from William Morris
13 tell you what they thought of John DiMatteo?
14 A Myself, no.
15 Q Well, did you ever hear from
16 anybody, what anybody from William Morris had
17 ever said about what they thought about John
18 DiMatteo?
19 A Myself, no.
20 Q Did you ever hear -- I'm not
21 limiting it to you. I'm limiting it to have you
22 ever heard --
23 A Are you talking about documents?
24 Q Anything.
25 A I saw immediately that it was

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1 e-mail correspondence from William Morris
2 showing available artists. It seemed like a
3 pretty solid relationship to me.
4 Q You are drawing the inference --
5 A I thought you were asking for an
6 inference.
7 Q I'm asking for something more.
8 Have you ever heard anybody say,
9 you know, so and so, William Morris has a good
10 opinion of John DiMatteo or a bad opinion of
11 John DiMatteo, or any opinion about John
12 DiMatteo?
13 A With William Morris, no.
14 Q What about with any talent
15 agency?
16 A Well, overall I guess you can say
17 that John had a very good reputation in our
18 business as the guy to book for electronic dance
19 talent, as they were going on again
20 consecutively, he had shows going on left and
21 right of the top artists out there. That speaks
22 for your reputation.
23 Did these people directly tell me
24 I love John DiMatteo, do I hate John DiMatteo?
25 No, I didn't have a conversation with them.

Dorfman - direct Page 144

1 Q With the talent agency, John
2 DiMatteo was the face of your team, correct?
3 A A hundred percent.
4 Q You wanted him to be the face of
5 your team because you believe he had a positive
6 relationship with the three major talent
7 agencies?
8 A Yes. When someone is booking
9 these artists consistently, as the biggest
10 booker in the tri-state area, and you are
11 hearing it from Electric Daisy, the biggest
12 festival at this time in the U.S., you want
13 Tiesto, you get John DiMatteo, and John is
14 booking Tiesto in show after show, Swedish House
15 Mafia, to name for a few, right at the time we
16 were doing business with him, seen him many
17 times before.
18 He was hands down, if you don't
19 call it a good relationship, well, the people
20 usually won't keep coming back.
21 Q So you described, I believe, up
22 through January of 2011, who was on your team
23 and who was doing what. My summary is that in
24 January of 2011 you had added John DiMatteo to
25 your team, correct?

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| <p>Dorfman - direct Page 149</p> <p>1 Look, to have money at stake with 2 Vito and John gave me a lot more bargaining 3 power with them how the event is going to be 4 produced. A little more skin in the game. 5 Q You were willing to give up the 6 potential to have 50 percent of the profit from 7 the event to John Sandberg? 8 A No. 9 Q Okay. 10 Let's go back to January 2011. 11 Profit from the event is going to be split 50 12 percent to John and Vito, 50 percent to Juice 13 Entertainment, correct? 14 A Yes. 15 Q If you entered into this 16 arrangement with Mr. Sandberg, you would be 17 giving up potentially 25 percent of Juice's 50 18 percent share of the net profits, correct? 19 A That is correct, if Sandberg 20 raised the capital and operated in a business 21 fashion that I was comfortable with. 22 To me it was a no brainer. I was 23 in the complete driver's seat on it. Someone is 24 coming in, giving you \$300,000, I'm not going to 25 say no.</p> | <p>Dorfman - direct Page 151</p> <p>1 Q Is there any -- setting aside 2 whether there is a written agreement, is there 3 any writing, whether it is handwritten notes, 4 back of a napkin scribbling, e-mails or text 5 messages, in which Vito Bruno tells you he's 6 making a commitment to fund the entire event? 7 A I believe there was a red line 8 agreement that went back in e-mail that I 9 haven't seen, I believe I saw after, when we 10 were going through our stuff to provide to you 11 guys. But to me we had a handshake deal and we 12 had a deal, which I honored. 13 Q Okay, we'll look at that red line 14 agreement. 15 Do you think that red line 16 agreement contains any commitment by Mr. Bruno 17 to fund the event? 18 A No, but when you sit with the 19 godfather of dance and he tells me, I'm going to 20 fund the event, I'm doing a scene at Raceway 21 Park, I want to get into the Meadowlands, I want 22 to fund this event, I believe him. 23 Q Mr. Sandberg joined the team in 24 February 2011, correct? 25 A Yes.</p> |
| <p>Dorfman - direct Page 150</p> <p>1 If I did not like the way he 2 operated and he did not raise the other capital, 3 I would never let him be brought on board of 4 Juice Entertainment. He's talking about raising 5 capital for other events and other things. 6 Q Was this arrangement you 7 discussed with Mr. Sandberg ever reduced to 8 writing? 9 A No. 10 Q Was it ever -- I used a legal 11 phrase, reduced to writing, and I didn't mean to 12 imply just a formal contract that was signed. 13 Were there any writings between 14 you and Sandberg that discussed, related to, 15 reflect this arrangement in any way, be it 16 handwritten notes, back of a napkin scribbling, 17 e-mails, text messages, anything? 18 A No. 19 Q What about the agreement with 20 Vito Bruno where Vito agrees to fund the entire 21 event, is there any written agreement wherein 22 Vito Bruno has made a commitment to fund the 23 entire event? 24 A A written agreement? I do not 25 believe so.</p> | <p>Dorfman - direct Page 152</p> <p>1 Q And he joined saying he would 2 raise \$1.5 million, which you agreed to accept 3 if he could provide it in exchange for your 4 considering whether to give him membership in 5 Juice Entertainment, correct? 6 A Yes, at my sole discretion. 7 Q At your sole discretion. 8 Did anyone else join the team in 9 February 2011? 10 A If you call part of the team an 11 investor? 12 Q Okay, who is the investor? 13 A John Chiasullo. 14 Q He was an investor who did what? 15 A Loaned us \$300,000. 16 Q How did he come to make that 17 investment? 18 A John Sandberg set it up, and I 19 met with Mr. Chiasullo, whose wife I believe was 20 named Georgiana, and explained an event that we 21 were putting together, and he loved it and he 22 immediately wanted to invest money and he was 23 interested in investing more money into other 24 events. 25 Q Did anyone else join the team in</p> |

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| <p>Dorfman - direct Page 173</p> <p>1 Dorso?</p> <p>2 A TD-7?</p> <p>3 Q This exhibit.</p> <p>4 A This exhibit, no.</p> <p>5 Q Did you eventually enter into --</p> <p>6 did you eventually get something in writing from</p> <p>7 Al Dorso?</p> <p>8 A Yes.</p> <p>9 Q When was that?</p> <p>10 A First would be on December 1st</p> <p>11 where he granted - December 1st.</p> <p>12 MR. MARX: Why don't we mark</p> <p>13 this.</p> <p>14 (Exhibit marked for</p> <p>15 identification TD-8, State Fair engagement</p> <p>16 letter previously marked Dorso-2.)</p> <p>17 Q I ask you to look at what we</p> <p>18 marked as TD-8, which is a one-page document</p> <p>19 that we received in discovery from your lawyers</p> <p>20 entitled, "Engagement letter," dated December 1,</p> <p>21 2010.</p> <p>22 (Exhibit handed to the witness.)</p> <p>23 Q Is this the December 1st writing</p> <p>24 that you just referenced in your prior answer?</p> <p>25 A Yes, sir.</p> | <p>Dorfman - direct Page 175</p> <p>1 Entertainment, LLC in this document?</p> <p>2 A At this time I was using -- I put</p> <p>3 DelLuna, Inc. into it.</p> <p>4 Q Why did you choose DelLuna, Inc.</p> <p>5 Rather than Juice Entertainment?</p> <p>6 A At this time I could have put</p> <p>7 either or.</p> <p>8 Q And the agreement that you</p> <p>9 eventually entered into was with Juice</p> <p>10 Entertainment, correct?</p> <p>11 A Yes.</p> <p>12 Q Why did you change it from</p> <p>13 DelLuna to Juice Entertainment?</p> <p>14 A Well, two reasons there. Number</p> <p>15 one, Juice Entertainment didn't have any</p> <p>16 contracts or anything with anybody. It was a</p> <p>17 clean company to go into the Meadowlands with.</p> <p>18 There was also capital in Juice Entertainment's</p> <p>19 bank account.</p> <p>20 Q What capital was in Juice</p> <p>21 Entertainment's bank account?</p> <p>22 A \$300,000.</p> <p>23 Q Mr. Chiasullo's money?</p> <p>24 A Yes.</p> <p>25 Q Why couldn't that money go into a</p> |
| <p>Dorfman - direct Page 174</p> <p>1 Q Okay.</p> <p>2 And how did you come to get this</p> <p>3 letter signed by Mr. Dorso?</p> <p>4 A Well, again, I wanted something a</p> <p>5 little bit stronger, as you said, Jerry McGuire,</p> <p>6 Al Dorso's word, but I realized all the big</p> <p>7 companies would be coming in when they caught</p> <p>8 wind of this.</p> <p>9 I wanted something stronger in</p> <p>10 writing, and we were able to get this engagement</p> <p>11 letter signed that would -- we had a verbal</p> <p>12 word, but it wasn't everything I wanted, but at</p> <p>13 least he granted us exclusive on electronic</p> <p>14 dance festival for 2011.</p> <p>15 At this time I felt I was</p> <p>16 protected enough to be able to start reaching</p> <p>17 out to other people to pursue and produce that</p> <p>18 event.</p> <p>19 Q This document, as I understand</p> <p>20 it, grants DelLuna, Inc. certain rights?</p> <p>21 A Yes.</p> <p>22 Q Why were they the entity</p> <p>23 identified to receive this right?</p> <p>24 A Because it's my company.</p> <p>25 Q Why didn't you identify Juice</p> | <p>Dorfman - direct Page 176</p> <p>1 bank account that DelLuna had?</p> <p>2 A It could have gone into that bank</p> <p>3 account. Like I said, Juice Entertainment</p> <p>4 didn't have any business with anybody at the</p> <p>5 time, so it didn't have any contracts</p> <p>6 outstanding there and it was a clean company</p> <p>7 that I had on file to do business with the State</p> <p>8 Fair. So it made more sense to me to enter into</p> <p>9 a formal contract with them.</p> <p>10 Q The engagement letter in the</p> <p>11 third paragraph says that, "The terms and</p> <p>12 conditions of this agreement will be set forth</p> <p>13 in a formal contract at a later date as more</p> <p>14 information is forthcoming."</p> <p>15 Did I read that correctly?</p> <p>16 A Yes, you did, sir.</p> <p>17 Q Whose idea was it to structure</p> <p>18 things in this way? Specifically, that there</p> <p>19 would be an engagement letter entered into which</p> <p>20 you said before gave you some things, but not</p> <p>21 everything you want, rather than having a more</p> <p>22 comprehensive agreement entered into at this</p> <p>23 time?</p> <p>24 A The best of my recollection on it</p> <p>25 was Al Dorso.</p> |

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| <p>Dorfman - direct Page 189</p> <p>1 approve of the acts that we were presenting. 2 Q Where does it say reasonably? 3 A That they have to approve of the 4 acts. 5 Q Does it mean that if they don't 6 approve of the act, that you can't have that act 7 perform at your event? 8 A That's the way it reasonably 9 looks like it can show. 10 Q Was that your understanding at 11 the time you signed the contract? 12 A Our understanding with AI was he 13 wanted to put on these concerts, he wanted to 14 put on as many shows as possible successfully 15 properly done, and we would have to present him 16 with the acts just like we did, and he wanted to 17 put shows on. He wanted to make money and he 18 wanted to grow business. 19 Q Now would you answer my question, 20 please? 21 A Do you want to repeat the 22 question? 23 Q At the time you signed this, did 24 you have the same understanding that you just 25 before told me you had about the reasonable</p> | <p>Dorfman - direct Page 191</p> <p>1 contract? 2 A Yeah, my understanding was that 3 we present him the acts that we were going with, 4 and as long as we were giving him something 5 reasonable to go with, he wanted us to perform 6 the shows and he wanted to have as many shows as 7 possible and have some good shows and produce 8 the business. 9 Q Do you recall discussing any 10 other provisions of this contract with AI Dorso 11 before you signed it? 12 A Yeah, there was a discussion with 13 something on insurance I recall, but I don't 14 remember what. It was something that we talked 15 about and resolved. 16 Q Look at TD-10. Do you see the 17 signature block on page 15 signed by State Fair 18 Inc., by AI Dorso, president? 19 Did I read that correctly? 20 A Yes, you did, sir. 21 Q The signature blocks for Juice 22 Entertainment, LLC, there are three signatures 23 there, correct? 24 A Yes, sir. 25 Q The first one is John Sandberg,</p> |
| <p>Dorfman - direct Page 190</p> <p>1 approval, that specifically if State Fair 2 disapproved of an act, you could not engage that 3 act to perform at the event? 4 A The conversations that we had 5 that you just asked me, the conversations we had 6 were that we would let him know who we were 7 booking and he wanted to put on shows. If there 8 was something way off the wall, I guess 9 obviously his right, looking at this, that we 10 couldn't do it. 11 He was open to get involved with 12 most all the business that we presented to him. 13 Q So you had an obligation to 14 provide him with a proposed talent list prior to 15 the event? 16 A Yes. 17 Q He had the right, if he wanted 18 to, to reject an act that you were proposing, 19 correct? 20 A From what it reads here, yes. 21 Q I'm not the one who signed the 22 contract. I'm not the one that discussed it 23 with AI Dorso. You are. 24 So my question is, was that your 25 understanding at the time you signed the</p> | <p>Dorfman - direct Page 192</p> <p>1 who is identified as partner. 2 Did I read that correctly? 3 A Yes. 4 Q The second one is Thomas Dorfman, 5 who is identified as partner. 6 Did I read that correctly? 7 A Yes. 8 Q The third one is Chris Barrett, 9 Christopher Barrett, identified as partner. 10 Did I read that correctly? 11 A Yes. 12 Q Did all three of you in fact sign 13 this agreement? 14 A Yes. 15 Q Were John Sandberg and Chris 16 Barrett partners in Juice Entertainment, LLC? 17 A Chris Barrett was a silent 18 partner in Juice Entertainment, LLC, John 19 Sandberg was not. 20 Q What does silent partner mean in 21 this context as you use it? 22 A That Chris Barrett, as a silent 23 partner in my context, would have received the 24 rewards of production of events that Juice 25 Entertainment produces.</p> |

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| <p>Dorfman - direct Page 221</p> <p>1 to look at the document we marked as exhibit 2 TD-13, document produced to us in discovery by 3 your lawyers. It appears to be an e-mail sent 4 from Chris Barrett to you, Alan Sachs and Paul 5 Potter dated November 30, 2010. The subject is 6 entitled, "Business plan" and it encloses a 7 document there entitled, "Meadowlands music 8 festival business plan." 9 (Exhibit handed to the witness.) 10 Q My question will be whether you 11 have ever seen this document before? 12 (Pause.) 13 Q You are free, like everything, 14 read as much or as little as you want. My 15 question will be whether -- if you can tell 16 whether you have seen this before just by 17 skimming it? 18 A By skimming it I don't recall. 19 There have been thousands and thousands of 20 documents that we turned over to you. 21 Q Okay. 22 If you have to read it to answer 23 the simple question -- I'm not trying to be 24 difficult here, but if you have to read it in 25 order to answer the question whether you have</p> | <p>Dorfman - direct Page 223</p> <p>1 tickets go on sale. Really varies on event, 2 location and size. 3 Q And it is a discounted price for 4 customers to take advantage of? 5 A Yeah, discounted price for a 6 limited amount of tickets. Some people buy 7 tickets, and this way your friends have tickets, 8 and other people talk about it and other people 9 want to have tickets, and you can stir up 10 business pretty quickly with a discounted ticket 11 price. 12 Q Do you recall discussing this 13 business plan with anybody? 14 A I haven't looked at the whole 15 thing, but from what I do recall just briefly 16 looking at it, I don't recall the document. 17 Some of it seems correct, some of it, I don't 18 know what it is about the Brooklyn warehouse. 19 Q Okay. 20 MR. MARX: Can you mark this, 21 please? 22 (Exhibit marked for 23 identification TD-14, Promissory note, lump sum 24 payment, \$300,000.) 25 (Exhibit handed to the witness.)</p> |
| <p>Dorfman - direct Page 222</p> <p>1 seen this document before and it's something 2 you're familiar with. 3 A I don't recall if I saw it. 4 Q Okay. 5 What is the Brooklyn warehouse? 6 A I do not know. 7 Q Okay. 8 Did you ever discuss selling 9 limited membership units in your events? 10 A No. 11 Q Did you ever discuss introducing 12 the event with a highly publicized early bird 13 special by February 2011? 14 A I'm sure at some point in time, 15 I'm not sure of time frame, that we discussed an 16 early bird special, which is standard at no 17 matter what time you sell your tickets. 18 Someone has a concert in one 19 month, they usually do an early bird special. 20 I'm sure we discussed an early bird special. 21 Q What is an early bird special? 22 A An early bird special, it is 23 usually if it's a show that's a month out, 24 pretty standard in the industry, they put up an 25 early bird special, or first two hours that</p> | <p>Dorfman - direct Page 224</p> <p>1 Q I'm going to hand to you and ask 2 you to review the document that I marked as 3 TD-14 bearing a title "Promissory note" which 4 appears to have your signature on the last page. 5 (Pause.) 6 Q As it is with every other 7 document I hand you, my first question will be, 8 have you seen this document before? 9 A Yes, sir. 10 Q You have? You don't have to 11 review anymore to answer that question. 12 What is this? 13 A This is a promissory note from an 14 investor, John Chiasullo. 15 Q And you signed this document? 16 A Yes, sir. 17 Q Now, describe for me what was the 18 nature of the transaction that you guys entered 19 into with Mr. Chiasullo? 20 A From the document itself? 21 Q Do you have an independent 22 understanding of what the transaction was? 23 A Yes. Pretty simply, John 24 Chiasullo was investing \$300,000 into events we 25 were putting on at the Meadowlands in return for</p> |

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| <p>Dorfman - direct Page 225</p> <p>1 the electronic dance event and transfer 25 2 percent of the net profit of the event from year 3 one. 4 Q When you say 25 percent of the 5 net profit from the event, do you mean the 6 electronic dance event at the 2011 State Fair? 7 A Yes. 8 Q Plus repayment of the \$300,000? 9 A Yes. 10 Q So the terms of the deal were he 11 provides you with the \$300,000. And did he 12 provide that on or about February 16th, which is 13 when the note was dated? 14 A He provided, I believe, the next 15 day. 16 Q So on February 17th he provides 17 \$300,000, and then the event takes place the 18 25th and 26th of June, a couple months later, 19 several months later. He gets back his \$300,000 20 in principal, and he gets 25 percent of what? 21 A 25 percent of the net profit. 22 Q The net profit of what exactly? 23 25 percent of what? 24 A 25 percent of the net profit of 25 Juice Entertainment.</p> | <p>Dorfman - direct Page 227</p> <p>1 sheet of expenses. 2 Q I looked at the spread sheet. I 3 see that expenses are covered. That gives me a 4 net profit number? 5 A Yes. 6 Q What happened to that net profit 7 in the electronic dance event? 8 A 50 percent of it went to Vito 9 Bruno and John DiMatteo. The other 50 percent 10 goes to Juice Entertainment. Out of Juice 11 Entertainment profit, 50 percent, which is a 12 hundred percent of Juice Entertainment's net, 25 13 percent of the net profit goes to John Chiasullo 14 for year one. 15 Q So if I was good at math, I could 16 figure out what Mr. Chiasullo's percentage of 17 the overall net profit would be. I would take 18 50 percent and take a quarter of that? 19 A Take a quarter of Juice 20 Entertainment's profit. 21 Q Which was 50 percent of the net. 22 Let's say there was a million 23 dollars net profit. Vito and John get 500,000, 24 right? Is that correct? 25 A Yes.</p> |
| <p>Dorfman - direct Page 226</p> <p>1 Q Okay. 2 So the event takes place on the 3 25th and 26th, correct? 4 A Yes. 5 Q Tell me what happens to the 6 proceeds from the event. There is proceeds, 7 ticket sales, sales from revenue generated from 8 other sources, correct? 9 A Yes. 10 Q What happens next to the proceeds 11 from that event? 12 A An electronic dance event, 50 13 percent of the money, of the net profit -- 14 Q Before we get to the net profit 15 what happens? 16 A You pay your bills. 17 Q What bills get paid? 18 A Do you want a list of all of them 19 off the top of my head? 20 Q Yes, of course. 21 A Talent, marketing, radio station 22 marketing, security if you didn't reach your 23 limitations in the contract with Al Dorso for 24 him to cover the security and all expenses, 25 publicists. I believe we sent you a spread</p> | <p>Dorfman - direct Page 228</p> <p>1 Q Juice Entertainment gets 500,000? 2 A Yes. 3 Q And of that, for the first year 4 John Chiasullo gets 125? 5 A Yes. 6 Q Year two, we are in 2012, Vito 7 and John, 500,000, Juice Entertainment 500,000, 8 correct? 9 A No. 10 Q What happened in year two? 11 A Year two, I have deals for year 12 one set in place. Year two, if everything went 13 properly, we probably continue the relationship 14 potentially with John and Vito. If not, it 15 would be in the discretion of Juice 16 Entertainment who owned the contract to the 17 Meadowlands, owners of Juice Entertainment, the 18 percentage share. 19 Q The deal with John and Vito to 20 share 50 percent of the net profit from the 21 electronic dance event was only for the 2011 22 event? 23 A It was for year one, with 24 anticipation of hopefully doing more business 25 together.</p> |

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| <p>Dorfman - direct Page 229</p> <p>1 Q And where would I find the terms 2 of that agreement? Is that written down 3 anywhere? 4 A No. 5 Q What was done with the \$300,000 6 that Mr. Chiasullo provided to Juice 7 Entertainment on February 17th? 8 A Mr. Marx, after your client's 9 involvement and we had lost all our talent, Vito 10 and John had walked away due to your client's 11 actions. I was in -- our team was in a 12 scrambling mode to try to perform our contract. 13 It was great to have a contract 14 signed, but the damage had already been done. 15 So we were trying -- as your clients had already 16 directly told me, that we were not going to get 17 any talent through major agencies, such as 18 William Morris controlled the majority of the 19 talent in the U.S., we were trying to operate 20 underneath the radar. 21 I've been in the business a very 22 long time. I booked a lot of talent. I never 23 had to operate underneath the radar with 24 reputable agencies out there. 25 So John Sandberg, being present</p> | <p>Dorfman - direct Page 231</p> <p>1 name Drake, Nicki Minage and Trey Songz. 2 These artists, if we were able to 3 book them, could have saved our contract at the 4 Meadowlands with Al Dorso, because very popular, 5 especially Drake at the time, could have put 6 together an alignment, could have pulled off a 7 concert of the magnitude of in the 20 plus 8 thousand people that Al Dorso was looking for. 9 John Sandberg had contacted some 10 agents that I never heard of. He insisted on 11 his relationship strongly from the basketball 12 world. And John Sandberg at the time was a 13 basketball coach, I believe it was Don Bosco 14 Prep, a pretty reputable school, and had a lot 15 of connections through that. And he vouched for 16 the hip hop connection through an associate at 17 Don Bosco, the same way I met people like Bj 18 Rogers and Brian Cushing, and presented some 19 contracts. He was attempting to get contracts 20 under the radar from people that were directly 21 friends with Drake and Nicki Minage and Trey 22 Songz. 23 I knew at this time that we 24 couldn't go to the bigger agencies in fear that 25 Live Nation was going to stop any talent we were</p> |
| <p>Dorfman - direct Page 230</p> <p>1 at the Live Nation meeting, heard directly from 2 them that we were not going to get any talent 3 whatsoever for our event. He was looking into 4 trying to go underneath the radar and pull off a 5 hip hop and a Latin event, which I okayed to 6 look into at this time, because we were -- the 7 clock was ticking and we were in a time of pure 8 desperation. 9 John Sandberg did have a lot of 10 reputable contacts in the sports industry, like 11 I said, the Houston Texans, Ryan Cushing, vice 12 president of the Nets, and had a great 13 reputation up to the time of the March 3rd 14 meeting. 15 So as we were struggling to try 16 to keep our contract, John had two connections 17 in the hip hop world, I believe it was through, 18 off the top of my head, Puff Daddy's record 19 label. We had met actually with somebody from 20 Bad Boy Records. 21 On the Latin side they introduced 22 us to Aventura, which is actually the biggest 23 Latin band in the world. 24 John Sandberg was going and 25 looking to book hip hop artists, primarily the</p> | <p>Dorfman - direct Page 232</p> <p>1 going to get, and I was trying to save the 2 contract. 3 Simply put, I wasn't so sure 4 about the connections that he had. The 5 connections so far hadn't matched up. We lost 6 the vast majority of the money after we signed 7 the contract, I believe in mid to late March. 8 We did not find out actually 9 until late March, when we were down in Miami at 10 the music conference, that we actually lost the 11 money in a scam. 12 I'm not sure to this day if they 13 were actually members of the camp of Young Money 14 and Drake and someone just kept the money 15 because it was done under the radar, but we lost 16 the majority of the money in a scam. 17 (Exhibit marked for 18 identification TD-15, E-Mail with attachment 19 dated March 27, 2011.) 20 Q Mr. Dorso, I'm going to hand you 21 what we marked as TD-15, and read as much as you 22 need of it to answer the question whether you 23 have seen this e-mail dated March 27, 2011 from 24 John Sandberg to you and Chris Barrett entitled, 25 "For FBI."</p> |

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| <p>Dorfman - direct Page 233</p> <p>1 (Exhibit handed to the witness.) 2 (Pause.) 3 A I do recall seeing this e-mail. 4 Q Was this a summary prepared by 5 John Sandberg of -- describing the events that 6 you just described concerning the Drake money 7 that he was intending to provide to the FBI? 8 A I did just read page one of this, 9 so let me read page two. 10 Q Sure. 11 (Pause.) 12 A Yes, sir. 13 Q Do you recall that Mr. Sandberg 14 prepared a summary to give to the FBI and 15 perhaps other law enforcement agencies? 16 A Yes. 17 Q And do you recall reviewing that? 18 A I remember looking briefly at 19 stuff that was being given to the FBI and other 20 law enforcement authorities. 21 Q Were you involved in any of the 22 transactions that Mr. Sandberg described 23 concerning the interaction with Drake, with 24 people purporting to act on behalf of Drake and 25 Nicki Minage?</p> | <p>Dorfman - direct Page 235</p> <p>1 A The other \$150,000, if that's the 2 amount that was there, some of the money was 3 used as business expenses in trying to produce 4 the festival. We also produced an event with -- 5 nobody was interested in the Meadowlands for any 6 talent for us. So we produced an event right 7 down the road in the swamp in Carlstadt. 8 Actually, the venue is called Dragonfly. 9 I was offered Charlie Sheen, who 10 at the time was very popular, number one 11 celebrity probably in the world at that time. I 12 was offered to book him anyplace I wanted to. 13 I booked him at Dragonfly. 14 In a short period of notice, 15 while I was actually hospitalized, we had sent, 16 to stir up interest for the Meadowlands, which 17 we also sent a press release out for showing 18 Charlie Sheen there. I was trying to get people 19 interested in it, which actually did work for 20 Aventura, the Latin bank, inviting them to the 21 Charlie Sheen event. 22 That actually did stir their 23 interest up where they were actually becoming 24 our 50/50 partner in a Latin festival, and after 25 the clock ticked out.</p> |
| <p>Dorfman - direct Page 234</p> <p>1 A In a limited fashion. 2 Q Mr. Sandberg was predominantly 3 involved? 4 A Yes. 5 Q The amount of money lost in the 6 Drake transaction was about \$132,000? 7 A I believe it was a little bit 8 more than that off the top of my head. 9 Q How much more do you think there 10 was? 11 A Not exactly sure, but I think it 12 was another -- I'm speculating -- another 15 to 13 \$20,000. That could be incorrect. 14 Q Assuming it was another 15 or 20, 15 I asked you the question, it seems like a long 16 time ago, but it wasn't that long ago, what did 17 Juice Entertainment do with the \$300,000 that it 18 received from Chiasullo on February 17th? 19 In response to that question you 20 told me all about the Drake situation, which, 21 you know, setting aside whether it is really 22 responsive to my question, it accounts for 132, 23 maybe \$150,000. 24 What happened to the other 25 \$150,000?</p> | <p>Dorfman - direct Page 236</p> <p>1 The money that we invested in the 2 Charlie Sheen event and the rest of the money 3 was used -- I don't have the bank statement in 4 front of me -- for Juice Entertainment trying to 5 produce events. 6 Q The Charlie Sheen event was on or 7 about April 8th at Dragonfly? 8 A That sounds about right. 9 Q You had to pay Charlie Sheen 10 management about \$55,000 to secure his 11 appearance? 12 A That sounds about right. 13 Q You used that money that you got 14 from Mr. Chiasullo to pay Charlie Sheen at the 15 Dragonfly event? 16 A Yes. We tried to stir up 17 interest for the Meadowlands, showing that we 18 can book literally right across the street. I 19 can book the number one celebrity in the world 20 at the time, here in the swamp, right next to 21 the prime real estate that we have, that at this 22 time nobody would be interested in speaking to 23 any of us, or talking to us about -- in an 24 attempt to try to -- last minute attempt to try 25 to save this contract.</p> |

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| <p>Dorfman - direct Page 237</p> <p>1 Q So using the money to do the 2 Charlie Sheen event was an attempt to save the 3 State Fair event? 4 A Yes, and book Charlie Sheen in 5 the colder weather at Dragonfly, and had to put 6 tents outside with some heaters when it was 7 offered to me from an agency that booked 8 celebrities, that I could have booked an indoor 9 place that would have been much better. 10 Q Where was this Chiasullo money 11 kept? In a bank account? 12 A Yes. 13 Q What bank was that? 14 A At the time Provident Bank. 15 Q Who got the records for that bank 16 account, the statements? 17 A I don't recall. 18 Q Did you receive statements from 19 Provident Bank? 20 A I don't recall. 21 Q If you had, would you have 22 provided them to your lawyer to turn over to us 23 in this case? 24 A I turned over every single thing 25 possible that I had to turn over.</p> | <p>Dorfman - direct Page 239</p> <p>1 a lawsuit, or some papers that the Chiasullos 2 filed and had delivered to your house. 3 Is it your understanding that the 4 Chiasullos sued you, Barrett, Sandberg and Juice 5 Entertainment to collect the \$300,000 you owed 6 them? 7 A I'm not sure if it went as far as 8 a lawsuit, but definitely papers in that 9 incarnation, yes. 10 Q And have you spoken to the 11 Chiasullos or anyone acting on their behalf 12 concerning the money that you owe them? 13 A No, I have not. 14 Q Do you know whether Mr. Barrett 15 has? 16 A Not to my recollection. 17 Q Do you know whether Mr. Sandberg 18 has? 19 A I wouldn't know. 20 Q Have you told me everything you 21 know concerning the Chiasullos attempt to 22 collect this \$300,000 from you and where they 23 stand in those efforts? 24 A That's everything that I 25 personally know.</p> |
| <p>Dorfman - direct Page 238</p> <p>1 Q Do you know whether Mr. Barrett 2 got bank statements from Provident with respect 3 to this bank account? 4 A Mr. Barrett had them, I'm sure he 5 would have turned over every document possible, 6 as we went through everything possible that we 7 could have over to our attorneys. 8 Q And what about Mr. Sandberg, do 9 you know whether he got those bank statements? 10 A Do not know. 11 Q Now, if you look at the 12 promissory note, TD-14, the first page, the 13 payment is due July 10th, 2011. Did I read that 14 correctly? 15 A Yes, sir. 16 Q Was Mr. Chiasullo repaid? 17 A Unfortunately not. 18 Q And why not? 19 A Because the event never took 20 place. We didn't have the money to repay them. 21 I will monitor a deal with them 22 and pay them every dollar and cent that I owe 23 them. Unfortunately, the situation wound up how 24 it did. 25 Q I believe we talked earlier about</p> | <p>Dorfman - direct Page 240</p> <p>1 Q I feel like you know more and 2 you're just not telling me. I don't know if I'm 3 not asking it the right way. 4 To me it's strange that you owe 5 somebody \$300,000. You didn't repay it. We 6 know they filed a complaint, and yet you have no 7 further information about that. 8 A Well, my attorneys might have 9 spoken with them, which is a possibility. 10 Q Okay. 11 Have your attorneys spoken with 12 the Chiasullos or their representatives 13 concerning the amount of money you owe them? 14 A I believe my attorneys did speak 15 with their attorneys. 16 Q Which attorney are you talking 17 about? Which of your attorneys? 18 A Someone from -- 19 Q The Morristown guy. Who is the 20 Morristown guy? 21 A Andrew Smith. 22 Q Was it Andrew Smith? 23 A No. It would have been from 24 Mancini or the Ajamie law firm. 25 Q Okay, I'll ask them.</p> |

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| <p>Dorfman - direct Page 241</p> <p>1 I'm not asking you to tell me 2 what they told you yet, I may, but I don't want 3 to know what they told you, if they told you 4 anything yet. I just want you to answer yes or 5 no. 6 Have any of your lawyers told you 7 about conversations they had with the 8 Chiasullos' lawyers concerning this debt? 9 MR. SIEGAL: Objection. 10 I'm going to instruct you not to 11 answer that. I think that calls for disclosure 12 of attorney-client communications. 13 The way you phrase the question, 14 if he answered yes or no, then he's testifying 15 to the substance of the conversation. 16 MR. MARX: I disagree, but I'm 17 willing to rephrase. 18 Q I want to know, and I'll ask 19 Mr. Siegal -- 20 MR. SIEGAL: Off the record? 21 (Discussion off the record.) 22 Q Okay, I'll move on. 23 Whatever happened to the 24 investigation as to what happened to the 25 Drake/Nicki Minage money?</p> | <p>Dorfman - direct Page 243</p> <p>1 involved in all the discussions? 2 A It was Detective Hammer -- I 3 can't remember the other detectives' names, two 4 or three of them in there, and Mr. Sandberg was 5 present in the discussions with them. I believe 6 they called me, off the top of my head, to let 7 me know that there was nothing that they could 8 do, or I called them as a follow-up. 9 Q Did they ever imply to you that 10 they thought Mr. Sandberg might have been 11 involved in somehow keeping the money for 12 himself or splitting the proceeds? 13 A No, he didn't. 14 Q Did it ever occur to you that 15 maybe Mr. Sandberg had done that? 16 A No, it didn't. 17 Q Really? It never occurred to you 18 that maybe Sandberg had set this up to make it 19 seem like he lost the 130, \$150,000 when he 20 really kept it? 21 A No. 22 Q Are you aware of Mr. Sandberg 23 having engaged in dishonest business practices 24 at all? 25 A During this business time with</p> |
| <p>Dorfman - direct Page 242</p> <p>1 A After I found out about it, 2 immediately we contacted the FBI. The FBI told 3 us, or me directly, too, that this was not for 4 them to handle, not of importance level, and 5 that we need to speak to local authorities about 6 it. 7 Q Okay. 8 A So do you want me to continue, 9 Mr. Marx? 10 Q Yes, sure. 11 A We went to the Bergen County 12 Prosecutor's office and we spoke with Detective 13 Hammer, off the top of my head, my recollection, 14 and we showed them everything that had happened. 15 Detective Hammer told us, with a 16 couple of other detectives, told us they would 17 get back to us. 18 They got back to us, I'm not sure 19 in what time frame, and let us know that there 20 was nothing they could do to help us, that it 21 was purely a civil matter, and that there was 22 nothing that they could do. 23 Q Did you ever talk to Detective 24 Hammer or any other law enforcement officer out 25 of the presence of Mr. Sandberg, or was he</p> | <p>Dorfman - direct Page 244</p> <p>1 the Meadowlands? 2 Q Start with that, yes. 3 A The answer to that question there 4 is at that time Mr. Sandberg was, like I said, 5 had a very good reputation, vouched for by many 6 people in very high up areas. No. As far as I 7 know, squeaky clean. Never heard a peep of 8 anything dishonest about him. 9 Q How about since the time that you 10 were doing business with him? 11 A Since then I have heard of 12 something that if it was true that he did, would 13 be a terrible and horrible thing, as, if true, 14 would offend myself very much with things I saw 15 on the news media. 16 Q What are you talking about? 17 A I saw a thing on the news media 18 where he had received a lot of money from 19 Hurricane Sandy, and supposedly they weren't 20 able to disburse the funds, or they didn't 21 disburse the funds in a timely fashion that they 22 were supposed to do it, which obviously 23 Hurricane Sandy, being a New Jersey resident, 24 hits home and hurt a lot of people. 25 I had no association with John</p> |

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| <p>Dorfman - direct Page 257</p> <p>1 before?</p> <p>2 A Yes.</p> <p>3 Q And where have you seen them</p> <p>4 before?</p> <p>5 A The document here from the</p> <p>6 Provident Bank for \$300,000.</p> <p>7 Q That's TD-17.</p> <p>8 A TD-17, right here.</p> <p>9 TD-17, I saw this document</p> <p>10 produced by Provident Bank for the purpose of</p> <p>11 meeting with Al Dorso.</p> <p>12 We presented this document to Al</p> <p>13 Dorso showing that we had \$300,000 in our bank</p> <p>14 account.</p> <p>15 Q And you gave it to him on the</p> <p>16 meeting on March 7th?</p> <p>17 A On March 7th, which was confirmed</p> <p>18 in the tapes that you have in your possession.</p> <p>19 Q And you got this after the</p> <p>20 February 18th call that you had with Live</p> <p>21 Nation?</p> <p>22 A We got this after the</p> <p>23 February 18th call from Live Nation, and myself,</p> <p>24 first time I had it in my possession was when I</p> <p>25 was going to meet with him.</p> | <p>Dorfman - direct Page 259</p> <p>1 actually asked him what it was.</p> <p>2 Q Where were you when you saw this</p> <p>3 document?</p> <p>4 A Christopher Barrett's house, to</p> <p>5 the best of my recollection.</p> <p>6 Q And where was the document</p> <p>7 located?</p> <p>8 A The document was on his computer.</p> <p>9 Q So when you saw it and asked him</p> <p>10 about it, did you see it on the computer clean</p> <p>11 or did you see a hard copy of it somewhere?</p> <p>12 A No, no hard copy. Just on the</p> <p>13 computer screen.</p> <p>14 Q Okay.</p> <p>15 So you and Chris Barrett were at</p> <p>16 Barrett's house looking at documents on his</p> <p>17 computer screen?</p> <p>18 A Yeah, to turn over -- as we were</p> <p>19 going over everything to turn everything over to</p> <p>20 you.</p> <p>21 Q Who came across TD-18 first on</p> <p>22 the computer screen? Did you come across it and</p> <p>23 say, Chris what is this or did he show it to</p> <p>24 you?</p> <p>25 A We were going through thousands</p> |
| <p>Dorfman - direct Page 258</p> <p>1 Q Where did you get it from?</p> <p>2 A I got this another John</p> <p>3 Sandberg's house, best of my recollection.</p> <p>4 Q Do you know whose telephone</p> <p>5 number, or whose fax number is (201) 654-6191</p> <p>6 is?</p> <p>7 A Best of my recollection, that is</p> <p>8 John Sandberg's fax number.</p> <p>9 Q As far as you know, this was</p> <p>10 faxed from Provident to John on March 2nd, as</p> <p>11 the fax legend indicates?</p> <p>12 A Yeah, that's what it looks like</p> <p>13 it says.</p> <p>14 Q What about TD-18, do you know</p> <p>15 what that document is?</p> <p>16 A TD-18, first time I saw this</p> <p>17 document was actually after we were in</p> <p>18 litigation. And my attorneys -- I went through</p> <p>19 all my documents with Christopher Barrett, and</p> <p>20 were going through all the documents to turn</p> <p>21 over to make sure we turned it to our attorneys</p> <p>22 and make sure it was also turned over to you</p> <p>23 guys.</p> <p>24 The first time I saw it was</p> <p>25 actually sitting with Christopher Barrett and I</p> | <p>Dorfman - direct Page 260</p> <p>1 and thousands of documents that were presented</p> <p>2 to you. I remember seeing this myself and</p> <p>3 asking, do you know what this is?</p> <p>4 Q And what did he say?</p> <p>5 A He said, this is -- it took him a</p> <p>6 few minutes to get his recollection, but he</p> <p>7 said, this is a document that Sandberg had sent</p> <p>8 over to me, I believe it was via e-mail, after</p> <p>9 we had met with Live Nation. He said Sandberg</p> <p>10 sent it over and was trying to show that we had</p> <p>11 more money than we had.</p> <p>12 Chris said he immediately told</p> <p>13 him it was inappropriate, unacceptable, we will</p> <p>14 not tolerate this whatsoever and put a kabash to</p> <p>15 it.</p> <p>16 Q So Barrett told you that Sandberg</p> <p>17 e-mailed TD-18 to Barrett after the March 3rd</p> <p>18 meeting with Live Nation?</p> <p>19 A Yes.</p> <p>20 Q And he mailed it to Barrett with</p> <p>21 the explanation that you guys should use the</p> <p>22 document to show that you had more money in the</p> <p>23 Provident Bank account than you actually did?</p> <p>24 A It was Sandberg's idea, and Chris</p> <p>25 said he had conversation immediately with him,</p> |

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1 you're out of your mind. Look, I know it's
2 tough times right now. We do not need to go do
3 anything like this. We are not doing it. It
4 was unacceptable, and that was the end of it,
5 the end of the issue.
6 Q And this conversation that you
7 had with Barrett occurred when?
8 A When we were going through all
9 our e-mails and documentation to send to our
10 attorneys to turn over to you guys, which we did
11 send over and turn over to you guys.
12 Q So it was in 2012, 2013?
13 A Sometime that time frame, yes.
14 Q Did you ask Barrett why he didn't
15 come to you and tell you about Sandberg's
16 actions back in March of 2011 when it took
17 place?
18 A He did remind me that he spoke
19 briefly of when this actually took place, and I
20 do recall that Mr. Barrett told me, didn't tell
21 me anything about a bank statement, but he told
22 me Sandberg was trying to make a way that we had
23 more capital than we had. He said he took care
24 of it. He resolved it. It was a non issue.
25 To me, at that point, not knowing

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1 confirms that we had \$300,000, as well as myself
2 or Christopher Barrett.
3 Q Okay.
4 Have you come to learn of any
5 other instances when Sandberg was suggesting
6 that you guys were using dishonest business
7 practices?
8 A No.
9 Q Whether or not you guys actually
10 did -- I'm talking about whether Sandberg
11 suggested them and you guys rejected them.
12 A No, not whatsoever.
13 Q This was the only thing that you
14 have learned of when Sandberg was on your team
15 when he suggested that something dishonest to be
16 done?
17 A Yes.
18 Q So you had the conversation with
19 Al Dorso on February 18th, you told me
20 everything you can recall about that.
21 Al Dorso suggests that you
22 contact Live Nation and he gives you somebody's
23 number there?
24 A Jason Miller.
25 Q Jason Miller.

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1 anything more, it was a non issue to me. We
2 were trying to figure a way to keep our
3 contract, to be able to perform it.
4 Q Okay.
5 So Sandberg's suggestion to
6 Barrett that you guys present this false
7 document to anyone to show that you had more
8 capital than you actually had, which Barrett
9 rejected immediately, that was not one of the
10 things you were thinking about when you
11 described Sandberg's acting and saying things in
12 an irrational way that led you not to want to do
13 business with him? This was not one of those
14 things?
15 A The bank statement I didn't know
16 about. Maybe the raising capital thing could
17 have been a small thing in back of my head.
18 Didn't know the history, a minor thing, Chris
19 took care of it. It really wasn't an issue.
20 Q Okay.
21 A And as we met with the purpose of
22 this \$300,000 paperwork to show Al Dorso, and as
23 we met with Al Dorso, we told him -- we gave him
24 the document that we had \$300,000, and the
25 transcripts that you have, John Sandberg

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1 Did you call Jason Miller?
2 A Yes, I did call Jason Miller.
3 Q When do you recall calling him?
4 A A few days before March 3rd.
5 Is it all right if I take a
6 bathroom break?
7 (Recess.)
8 Q You called Jason Miller?
9 A Yes.
10 Q Shortly before the meeting on
11 March 7th?
12 A Correct.
13 Q Okay.
14 Do you recall what you spoke
15 about? Did you actually get through to speak to
16 him when you first called him?
17 A Yes, I did.
18 Q For how long did you speak?
19 A Very short period of time.
20 Q What do you recall about that
21 conversation?
22 A A meeting was set up.
23 Q Was it a telephone call less than
24 a minute?
25 A Yes.

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| <p>Dorfman - direct Page 309</p> <p>1 the door. Insomniac, the chances went to very, 2 very low. 3 Spoke with Donny or Pasquale 4 outside, and again they said that they loved the 5 real estate, they loved the venue, and obviously 6 they had to get back to us. 7 But in my opinion, I thought they 8 were 99 percent going to say no at that point. 9 Q What happened -- I take it that 10 you did not meet the April 1st deadline to 11 provide the information to Al Dorso? 12 A Correct. 13 Q You had some subsequent meetings 14 with Al Dorso about the deadline and where you 15 stood, correct? 16 A We did have two meetings with Al 17 Dorso. 18 Q Okay. 19 I have tapes, transcripts from 20 the tapes of those meetings, correct? 21 A You have transcripts of one of 22 those meetings. 23 Q What meetings do I not have? 24 A The meeting you do not have is -- 25 that you do not have transcripts for is when we</p> | <p>Dorfman - direct Page 311</p> <p>1 tape that meeting was, quite frankly, I was in 2 such drastic pain that I barely could make it to 3 the meeting, and I don't know about Chris, but 4 we were pretty emotionally worn out. 5 Q Do you recall the date of that 6 meeting? 7 A I don't recall the date. 8 Q You came back from Florida on 9 March 25th. You went into the hospital on the 10 31st. At some point between those two periods? 11 A Yes. 12 Q What happened at that meeting? 13 A To me, I was in a lot, a lot of 14 pain at this point in time. So my recollection, 15 not that clear. I know we talked a lot about 16 what had happened to us. 17 Best of my recollection, Al Dorso 18 talked a lot about how the Sports Authority had 19 really put a lot of pressure on him because of 20 Live Nation, and how much that pressure filtered 21 down on him, didn't expect the business that was 22 going on to date, something with a fence, that 23 they were giving problems with even putting it 24 up, that they never bothered him before. 25 The best of my recollection,</p> |
| <p>Dorfman - direct Page 310</p> <p>1 came back from Miami and we did not want to meet 2 with Al Dorso at this point. I was in severe, 3 severe pain. A short time later I ended up 4 being hospitalized. 5 Q You were hospitalized from the 6 31st to the 1st, two days? 7 A I guess you guys have the medical 8 records. It felt like longer to me. 9 Q The 31st to the 1st -- 10 A I don't know. 11 Q You don't recall one way or the 12 other? 13 A I don't recall off the top of my 14 head. 15 Q Okay. 16 You came back from Florida, you 17 were in a lot of pain. 18 A I was in a lot of pain. Al Dorso 19 made it mandatory that we were coming there 20 because we had to blow off a PR meeting because 21 we had nothing to account for. So we 22 reluctantly went to the meeting, went over in 23 sweatpants. 24 Q Why didn't you tape that meeting? 25 A I think the main reason we didn't</p> | <p>Dorfman - direct Page 312</p> <p>1 almost having to take down -- they wouldn't 2 allow him to put his fence in the ground. 3 And it was just about he said a 4 lot of stuff that happened, and just more him 5 ranting and raving, and us just saying, look, 6 you know, we are trying our best to see what 7 happened with Daisy, and we are working on 8 Aventura, doing whatever we can to make this 9 happen. 10 That's the best I can recall. I 11 don't have that much recollection of the 12 meeting. 13 Q There is another meeting and 14 there is a phone call that I have transcripts 15 for? 16 A Yes. 17 Q The meeting was on or about 18 April 15th? 19 A That sounds about right. 20 Q The transcript accurately 21 reflects what was discussed at that meeting? 22 A Yes, the transcript is accurate. 23 Q There is a phone call on 24 April 26th where he terminates the contract? 25 A I don't know the date, but, yes,</p> |

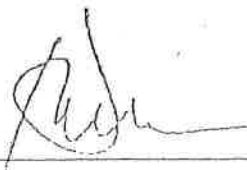
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| <p style="text-align: right;">Page 430</p> <p>1 events. It was managers, up in the hundreds of them. 2 It just -- the event never took place. The contract 3 and the lawsuits about the electronic dance festival, 4 which I think you correctly stated at top of this. 5 Q. Okay. But why then did you think it was 6 appropriate to give us Mr. LaVecchia's name today? 7 A. Yeah, when I, when I got to meet up with 8 Mr. LaVecchia socially, and we were hanging out at 9 his -- the restaurant he is either owner or general 10 manager, whatever, the Above one that you seem to 11 know a lot better than me about with the good 12 convenience store down the stairs, we had a nice 13 conversation, and during that conversation, he was -- 14 told me, hey, you know, the Meadowlands, the Latin 15 festival that you were going to produce was going to 16 be huge. He was like -- and he reminded me of him 17 meeting and hanging out with Aventura at the Charlie 18 Sheen event, and actually showed me a picture of him 19 and Charlie Sheen together. 20 Quite frankly, at that point in time 21 when I went to that Charlie Sheen event, I had just 22 got out of the hospital from stress, that I am 23 alleging your client for, and I had migraine 24 headaches. So I remember some of the celebrities 25 there. I know Aventura was there, but I don't</p> | <p style="text-align: right;">Page 432</p> <p>1 We might be finished. 2 THE WITNESS: Great. 3 (Recess) 4 MR. MARX: We have no further 5 questions. Thank you. 6 MS. WAGNER: And I have no questions. 7 (Deposition concluded at 3:3 p.m.) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> |
| <p style="text-align: right;">Page 431</p> <p>1 remember Mr. LaVecchia being there, and after Mr. 2 LaVecchia telling me he was there with Aventura, 3 picture proof with him there, and Mr. LaVecchia also, 4 you know, is one of the few people over the years -- 5 my whole industry abandoned me. I made a lot of 6 people money over the years, and met a lot of people 7 and I made a lot of money for people. Mr. LaVecchia 8 appreciated it, and you probably can see from this 9 type of business, Mr. Marx, you usually don't get a 10 thank you. Mr. LaVecchia is one to say thank you to 11 me for what I had done for his nightclub, how I 12 treated his staff, his people, and he didn't forget, 13 you know, he stayed in touch here and there, was very 14 small, but you know, the guy used to send me a thing 15 saying, you know, happy New Year's. 16 Q. So now that you had some time to reflect 17 on things and more closely look at the discovery that 18 has been provided, and that process caused you to 19 believe that Mr. LaVecchia and Mr. Genjian should be 20 identified as people with knowledge concerning the 21 case, is there anyone else that you think should be 22 included as someone with knowledge of the facts of 23 this case? 24 A. No. 25 MR. MARX: Let's take a 5 minute break.</p> | <p style="text-align: right;">Page 433</p> <p>1 C E R T I F I C A T E 2 3 I, PATRICIA LEE PAGE, a Certified Court 4 Reporter of the State of New Jersey, do hereby 5 certify that the foregoing is a true and accurate 6 transcript of the testimony as taken stenographically 7 by and before me at the time, place, and on the date 8 hereinbefore set forth. 9 I DO FURTHER CERTIFY that I am neither a 10 relative nor employee nor attorney nor counsel of any 11 of the parties to this action, and that I am neither 12 a relative nor employee of such attorney or counsel, 13 and that I am not financially interested in the 14 action. 15 16 17 18 19 PATRICIA LEE PAGE, C.C.R. 20 Certificate No. XI01377 21 22 23 24 25</p> |

C E R T I F I C A T E

I CERTIFY that the foregoing is a true and accurate transcript of the testimony as taken by and before me stenographically at the time and place aforementioned.

I FURTHER CERTIFY that I am neither attorney for nor counsel to any of the parties; parties of any of the attorneys in this action; and that I am not financially interested in the outcome of this case.



HOWARD A. RAPPAPORT, C.C.R
Certificate No. XI00416